

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LAMBDA OPTICAL SOLUTIONS, LLC,)
)
Plaintiff,)
)
v.) C.A. No. 10-487-LPS
)
ALCATEL-LUCENT SA, et al.,)
)
Defendants.)
)
v.)
)
ALCATEL-LUCENT USA INC., and)
ALCATELLUCENT HOLDINGS INC.,)
)
Counter-Claimants,)
)
v.)
)
LAMBDA OPTICAL SOLUTIONS LLC,)
LAMBDA OPTICAL SYSTEMS CORP., and)
ANASTASIOS TZATHAS,)
)
Counter-Defendants.)

UNDERTAKING CONCERNING RECEIPT OF
CONFIDENTIAL MATERIALS SUBJECT TO PROTECTIVE ORDER

I, _____ declare that:

1. My present residential address is _____

2. My present employer is _____
and the address of my present employer is _____

3. My present occupation or job description is _____
_____.

4. I have received and carefully read the Protective Order in this Action dated _____, and understand its provisions. As a condition precedent to receiving any Confidential Materials, as such are defined in the Protective Order, I agree to subject myself to the personal jurisdiction of this Court with respect to the enforcement of the provisions of the attached Protective Order. I understand that I am obligated, under Order of the Court, to hold in confidence and not to disclose the contents of any document marked or later designated pursuant to the Protective Order as **CONFIDENTIAL, CONFIDENTIAL -- OUTSIDE COUNSEL ONLY** or **HIGHLY RESTRICTED CONFIDENTIAL** to anyone other than those persons identified in Paragraphs 13, 14, or 15 of the Protective Order, respectively, to the extent that such persons are qualified to review such information. I further understand that I am not to disclose to persons other than those persons identified in Paragraphs 13, 14, or 15 of the Protective Order any words, substances, summaries, abstracts or indices of Confidential Materials or transcripts disclosed to me. In addition to the foregoing, I understand that I must abide by all of the provisions of the Protective Order.

5. At the termination of this Action or at any time requested by counsel of record in this Action, I will return to counsel of record in this Action all documents and other materials, including notes, computer data, summaries, abstracts, or any other materials including or reflecting **HIGHLY RESTRICTED CONFIDENTIAL** material which have come into my possession, and will return all documents or things I have prepared relating to or reflecting such information.

6. At the termination of this Action or at any time requested by counsel of record in this Action, I will destroy or return to counsel of record in this Action all documents and other materials, including notes, computer data, summaries, abstracts, or any other materials including or reflecting

CONFIDENTIAL or CONFIDENTIAL -- OUTSIDE COUNSEL ONLY material which have come into my possession, and will destroy or return all documents or things I have prepared relating to or reflecting such information.

7. I understand that if I violate the provisions of this Protective Order, I will be in violation of a Court Order and subject to sanctions or other remedies that may be imposed by the Court and potentially liable in a civil action for damages by the disclosing party.

8. I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on: _____ Name _____